

December 21, 2011

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization  
**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

On December 21, 2011, Charles Shipp of SC Partners, and undersigned counsel, both on behalf of TracFone Wireless, Inc., met with Christine D. Kurth, Policy Director and Wireline Counsel to Commissioner Robert M. McDowell. During the meeting, we discussed several issues before the Commission in the above-captioned Lifeline and Link Up Reform and Modernization proceeding.

Specifically, we discussed why allowing wireless ETCs, including so-called "facilities-based reseller" ETCs, to receive Link Up subsidies results in waste, fraud and abuse of Universal Service Fund resources; why all Eligible Telecommunications Carriers should be required to verify annually that all of their enrolled Lifeline customers remain eligible to receive Lifeline benefits; why the Commission should continue to allow for initial eligibility determinations based on self-certification under penalty of perjury, subject to appropriate safeguards; and why the Commission should not require ETCs to impose mandatory minimum charges on Lifeline customers.

Positions expressed during this meeting were consistent with those taken in previous written submissions. No new materials were presented. However, we provided Ms. Kurth copies of several ex parte letters previously submitted in this docket. These included letters dated November 15, 2011, December 5, 2011, December 12, 2011, and December 15, 2011.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,



Mitchell F. Brecher

cc: Ms. Christine D. Kurth